

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

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(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

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(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Signature

Name

Title (if any)

Organization (if any)

Date

Address

Phone

MAR 26 2008
FCC Mail Room

Received & Inspected

MAR 26 2008
FCC Mail Room

3/19/08

R#1, Box 294A, Fulton, TN 37414

812-847-8046

Church

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Received & Inspected
MAR 26 2008
FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Delores P. Sanger

Signature

3-14-08
Date

Delores P. Sanger

Name

PO Box 174, Matthews VA 23109
Address

804/725-9963
Phone

Title (if any)

Organization (if any)

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Title (if any)

Organization (if any)

Comments in Response to Localism Notice of Proposed Rulemaking
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MAR 26 2003

FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

E. Sue Gossage 3-20-08
Signature Date
E. Sue Gossage 109 Leaning Pine Trail
Name Address Rocky Hill, SC 29782
803-520-2252
Phone
Title (if any)
Organization (if any)

March 16, 2008

The Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Received & Inspected
MAR 26 2008
FCC Mail Room

Attn: Chief, Media Bureau

RE: MB Docket No. 04-233

I feel you are violating my First Amendment by your proposals. I choose Christian Radio and don't enjoy secular broadcasting.

You would be coercing Christian broadcasters as well as forcing service cutbacks and curtailing service whose programming listeners as myself so desperately need.

Sincerely,



Shirley LeCloux
3215 N Stevenson Pier Road
Sturgeon Bay, WI 54235



March 19, 2008

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Received & Inspected

MAR 26 2008

FCC Mail Room

Re: Broadcast Localism Proceeding
MB Docket No. 04-233

Dear Ms. Dortch:

WNGM AM 1230 has been operating in the Hiawassee, Georgia community for nearly two years. In that time, the Station has devoted countless resources to serving our local community. Our Station participates in our community, and understands the needs of our community, not because of government mandates but because the Station cares about our community and serving the public interest. I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding is addressed separately below.

Communications Between Licensees and Their Communities

More than 25 years ago, the FCC abandoned its misguided "ascertainment" requirements, when it correctly concluded that market forces, rather than government mandates, may be relied upon to ensure that broadcasters air programming that is responsive to the needs and interests of their communities. Nothing has changed in those 25 years that should make the FCC reach a different conclusion now. If anything, broadcasters today face far more competition, from satellite radio and TV, cable, the Internet, and iPods, to such an extent that market forces virtually ensure that broadcasters air responsive programming. We know full well how important it is to address the needs and interests of the people in our communities. If we don't address those needs and interests, we know that market forces will drive listeners and viewers elsewhere. Government mandates will not change that equation, except to make it far more difficult and expensive to be a good broadcaster.

Accordingly, this Station opposes any reinstatement of the formal ascertainment process or the mandatory creation of advisory boards. The quarterly issues/programs list requirement, coupled with Commission review as necessary and public input at renewal time, has worked adequately over the past 25 years. The potential benefits, if any, of these unfunded mandatory proposals are severely outweighed by the costs involved. Instead, broadcasters should be given the flexibility, in their important role as stewards of the broadcast airwaves, to communicate with their communities in a manner that best suits the station and the community.

Remote Station Operation

For many years, broadcasters have been afforded the flexibility to operate without station personnel

present at or near transmission facilities. This has been particularly important in emergency situations, where broadcaster resources may need to be devoted elsewhere. This Station opposes any efforts to remove the flexibility that the Commission has wisely provided to broadcasters. Many broadcasters simply cannot afford to staff their facility during all hours of operation and may be forced to shut down, which would be an extreme disservice to the public. Other broadcasters have invested thousands of dollars in technology to be sure we are immediately notified of any on-air problems. We do not believe the Commission should nullify those investments and require us to make even more expenditures for unneeded personnel

Main Studio Rule

Similarly, this Station opposes any restrictions to the main studio rule. For many years, stations have been given the choice as to where to locate their main studio in the communities they serve. Due to variations in topography, and in order to address the needs of the various communities they serve, broadcasters have been able to rely on the flexible approach the FCC has adopted. No changes to this flexible approach are necessary or warranted.

Voice-Tracking and National Playlists

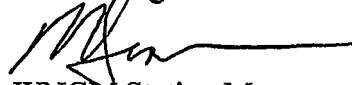
This Station opposes any Commission regulation that would restrict the practice of voice-tracking. Voice-tracking can be a useful tool for smaller broadcasters to bring popular non-local talent to the local airwaves, as a benefit to their communities. Any restriction on this ability would be a disservice to the public, and any disclosure requirements potentially would infringe the First Amendment rights of broadcasters. Similarly, station playlists are a matter of licensees' discretion, and are tailored to serve the tastes of the communities they serve. The Commission is prohibited by statute from regulating the content of broadcast material, and should not encroach on the editorial freedoms broadcasters enjoy under the First Amendment.

License Renewal Procedures

Finally, the Commission has proposed the adoption of quotas for local programming. Such a proposal raises serious First Amendment concerns for broadcasters. Therefore, this Station opposes any government mandates in the form of quotas or specific minimum hours of local programming. Broadcasters, who work and live in their local communities, and who inherently know the needs and interests their communities, are in the best position to determine how best to provide responsive programming, including local programming, and to allocate their resources accordingly. Broadcasters need the flexibility that is built into the current system. It is this flexibility that allows us to provide programming that best serves the public interest.

Respectfully,

Mike Savage



WNGM Station Manager

101 South Main Street, Suite 6, Hiawassee, Ga. 30546
(706) 896-1230 Phone (706) 896-1784 Fax

Received & Inspected

MAR 20 2008

FCC Mail Room

March 16, 2008

The Secretary
Federal Communications Commission
445 12th St, SW
Washington, DC 20554

RE: MB Docket No. 04-233

Attn: Chief, Media Bureau

I listen to Christian radio and I believe that you would be violating the First Amendment by your proposal. I do not want to be forced to listen to secular broadcasting.

You would be coercing Christian broadcasters to air programming that we the listeners do not want to hear, nor agree with. I do not believe this would benefit anyone except the FCC. This amendment is not in the best interest of Christian radio stations or their listeners, you are VIOLATING our First Amendment.

Sincerely,

A handwritten signature in cursive script that reads "Crystal Willming". The signature is written in dark ink and is positioned below the word "Sincerely,".

Crystal Willming
2568 Cty C
Brussels, WI 54204

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FCC Mail Room

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~~We urge the FCC not to adopt rules, procedures or policies discussed above.~~

Lairig Townson

Signature

Date

3-21-08

FAIRY TOWNSON

Name

Address

156 Townson Rd.

Rita

Title (if any)

Phone

423-725-3764

Organization (if any)

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Randall Mills
Signature

3/20/08
Date

RANDALL MILLS
Name

40 Rice Mills Lane
Address

New/ADN N.C. 28657
Phone

Title (if any)

Organization (if any)

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Doug Heaton

Signature

Date

3-20-08

Doug Heaton

Name

Address

8033 Hwy 19 P.O. Box 37687

Title (if any)

Phone

772-3801

Organization (if any)

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Betty L. Mills

Signature

3-20-08

Date

Betty L. Mills

Name

40 Rice Mills Ln.

Address

Newland, NC 28657

Phone

(Title, if any)

Organization (if any)

Vidalia Communications Corporation

Box 900, 1501 Mt Vernon Rd, Vidalia, GA 30475 912-537-9202/FAX 537-4477
www.vidaliacommunications.com

March 19, 2008

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Received & Inspected

MAR 26 2008

FCC Mail Room

Re: Broadcast Localism Proceeding
MB Docket No. 04-233

Dear Ms. Dortch:

Station WTCQ-FM has been operating in our Vidalia, GA community for nearly 40 years. In that time, the Station has devoted countless resources to serving our local community. Our Station participates in our community, and understands the needs of our community, not because of government mandates but because the Station cares about our community and serving the public interest. I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding are addressed separately below.

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98Q
Today's Choice
WTCQ

Goldies 97AM
Good Time Oldies
WVOP

101.7 FM
Sweet Onion Country
WYUM

"GEORGIA ASSOCIATION OF BROADCASTERS AWARDS WINNER"

Remote Station Operation

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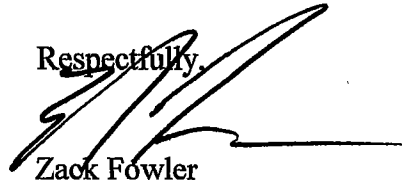
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Respectfully,

A stylized, handwritten signature in black ink, consisting of several overlapping, sweeping strokes that form a cursive representation of the name Zack Fowler.

Zack Fowler
General Manager

Vidalia Communications Corporation

Box 900, 1501 Mt Vernon Rd, Vidalia, GA 30475 912-537-9202/FAX 537-4477
www.vidaliacommunications.com

March 19, 2008

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Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
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MB Docket No. 04-233

Dear Ms. Dortch:

Station WYUM-FM has been serving our Mount Vernon, GA community for nearly 10 years. In that time, the Station has devoted countless resources to serving our local community. Our Station participates in our community, and understands the needs of our community, not because of government mandates but because the Station cares about our community and serving the public interest. I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding are addressed separately below.

Communications Between Licensees and Their Communities

More than 25 years ago, the FCC abandoned its misguided "ascertainment" requirements, when it correctly concluded that market forces, rather than government mandates, may be relied upon to ensure that broadcasters air programming that is responsive to the needs and interests of their communities. Nothing has changed in those 25 years that should make the FCC reach a different conclusion now. If anything, broadcasters today face far more competition, from satellite radio and TV, cable, the Internet, and iPods, to such an extent that market forces virtually ensure that broadcasters air responsive programming. We know full well how important it is to address the needs and interests of the people in our communities. If we don't address those needs and interests, we know that market forces will drive listeners and viewers elsewhere. Government mandates will not change that equation, except to make it far more difficult and expensive to be a good broadcaster.

Accordingly, this Station opposes any reinstatement of the formal ascertainment process or the mandatory creation of advisory boards. The quarterly issues/programs list requirement, coupled with Commission review as necessary and public input at renewal time, has worked adequately over the past 25 years. The potential benefits, if any, of these unfunded mandatory proposals are severely outweighed by the costs involved. Instead, broadcasters should be given the flexibility, in their important role as stewards of the broadcast airwaves, to communicate with their communities in a manner that best suits the station and the community.

"

98Q
Today's Choice
WTCQ

Goldies 97AM
Good Time Oldies
WVOP

101.7 FM
Sweet Onion Country
WYUM

"GEORGIA ASSOCIATION OF BROADCASTERS AWARDS WINNER"

Remote Station Operation

For many years, broadcasters have been afforded the flexibility to operate without station personnel present at or near transmission facilities. This has been particularly important in emergency situations, where broadcaster resources may need to be devoted elsewhere. This Station opposes any efforts to remove the flexibility that the Commission has wisely provided to broadcasters. Many broadcasters simply cannot afford to staff their facility during all hours of operation and may be forced to shut down, which would be an extreme disservice to the public. Other broadcasters have invested thousands of dollars in technology to be sure we are immediately notified of any on-air problems. We don't believe the Commission should nullify those investments and require us to make even more expenditures for unneeded personnel

Main Studio Rule

Similarly, this Station opposes any restrictions to the main studio rule. For many years, stations have been given the choice as to where to locate their main studio in the communities they serve. Due to variations in topography, and in order to address the needs of the various communities they serve, broadcasters have been able to rely on the flexible approach the FCC has adopted. No changes to this flexible approach are necessary or warranted.

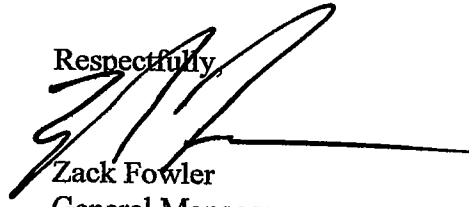
Voice-Tracking and National Playlists

This Station opposes any Commission regulation that would restrict the practice of voice-tracking. Voice-tracking can be a useful tool for smaller broadcasters to bring popular non-local talent to the local airwaves, as a benefit to their communities. Any restriction on this ability would be a disservice to the public, and any disclosure requirements potentially would infringe the First Amendment rights of broadcasters. Similarly, station playlists are a matter of licensees' discretion, and are tailored to serve the tastes of the communities they serve. The Commission is prohibited by statute from regulating the content of broadcast material, and should not encroach on the editorial freedoms broadcasters enjoy under the First Amendment.

License Renewal Procedures

Finally, the Commission has proposed the adoption of quotas for local programming. Such a proposal raises serious First Amendment concerns for broadcasters. Therefore, this Station opposes any government mandates in the form of quotas or specific minimum hours of local programming. Broadcasters who work and live in their local communities, and who inherently know the needs and interests their communities, are in the best position to determine how best to provide responsive programming, including local programming, and to allocate their resources accordingly. Broadcasters need the flexibility that is built into the current system. It is this flexibility that allows us to provide programming that best serves the public interest.

Respectfully,

A handwritten signature in black ink, appearing to be 'Zack Fowler', with a long horizontal line extending to the right.

Zack Fowler
General Manager



P.O. Box 8086 • Savannah, Georgia 31412 • (912) 234-1111

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

March 20, 2008

Received & Inspected

MAR 26 2008

FCC Main Room

Re: Broadcast Localism Proceeding MB Docket No. 04-233

Dear Ms. Dortch:

WTOC-TV has been operating in the Savannah, GA community and DMA for just over 54-years now. In that time, the Station has devoted countless resources to serving our local community. WTOC participates in our community, and understands the needs of our community, not because of government mandates, but because we care about our community and serving the public interest.

I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding are addressed separately below:

Communications Between Licensees and Their Communities

More than 25 years ago, the FCC abandoned its ascertainment requirements, when it correctly concluded that market forces, rather than government mandates, may be relied upon to ensure that broadcasters air programming that is responsive to the needs and interests of their communities. Nothing has changed in those 25 years that should make the FCC reach a different conclusion now.

If anything, broadcasters today face far more competition, from satellite radio and TV, cable, the Internet, and iPods, to such an extent that market forces virtually ensure that broadcasters air responsive programming. We know full well how important it is to address the needs and interests of the people in our communities. If we don't address those needs and interests, we know that market forces will drive listeners and viewers elsewhere. Government mandates will not change that equation, except to make it far more difficult and expensive to be a good broadcaster.

Accordingly, WTOC opposes any reinstatement of the formal ascertainment process or the mandatory creation of advisory boards. The quarterly issues/programs list requirement, coupled with Commission review as necessary and public input at renewal time, has worked adequately over the past 25 years. The potential benefits, if any, of these unfunded mandatory proposals are severely outweighed by the costs involved. Instead, broadcasters should be given the flexibility, in their important role as stewards of the broadcast airwaves, to communicate with their communities in a manner that best suits the station and the community.

Remote Station Operation

For many years, broadcasters have been afforded the flexibility to operate without station personnel present at or near transmission facilities. This has been particularly important in emergency situations, where broadcaster resources may need to be devoted elsewhere. WTOC opposes any efforts to remove the flexibility that the Commission has wisely provided to broadcasters. Many broadcasters

simply cannot afford to staff their facility during all hours of operation and may be forced to shut down, which would be an extreme disservice to the public. Other broadcasters have invested thousands of dollars in technology to be sure we are immediately notified of any on-air problems. We don't believe the Commission should nullify those investments and require us to make even more expenditures for unneeded personnel

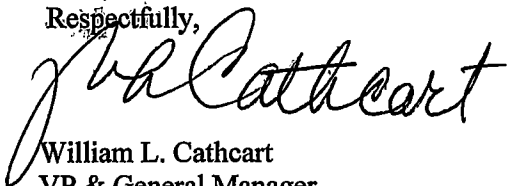
Main Studio Rule

Similarly, WTOC opposes any restrictions to the main studio rule. For many years, stations have been given the choice as to where to locate their main studio in the communities they serve. Due to variations in topography, and in order to address the needs of the various communities they serve, broadcasters have been able to rely on the flexible approach the FCC has adopted. No changes to this flexible approach are necessary or warranted.

License Renewal Procedures

Finally, the Commission has proposed the adoption of quotas for local programming. Such a proposal raises serious First Amendment concerns for broadcasters. Therefore, WTOC opposes any government mandates in the form of quotas or specific minimum hours of local programming. Broadcasters who work and live in their local communities, and who inherently know the needs and interests their communities, are in the best position to determine how best to provide responsive programming, including local programming, and to allocate their resources accordingly. Broadcasters need the flexibility that is built into the current system. It is this flexibility that allows us to provide programming that best serves the public interest.

Respectfully,



William L. Cathcart
VP & General Manager
WTOC-TV
Savannah, Georgia

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233. Received & Inspected

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so — and must not be adopted. MAR 26 2008
FCC

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so — even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency — and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks — and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.


Signature

Claudia Murphy
Name

Title (if any)

Organization (if any)

3-17-08
Date

1018 Kirkwood Ave
Address

Murfreesboro TN 37130
Phone

Vidalia Communications Corporation

Box 900, 1501 Mt Vernon Rd, Vidalia, GA 30475 912-537-9202/FAX 537-4477
www.vidaliacommunications.com

March 19, 2008

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Received & Inspected

MAR 26 2008

FCC Mail Room

Re: Broadcast Localism Proceeding
MB Docket No. 04-233

Dear Ms. Dortch:

Station WVOP-AM has been operating in our Vidalia, GA community for more than 60 years. In that time, the Station has devoted countless resources to serving our local community. Our Station participates in our community, and understands the needs of our community, not because of government mandates but because the Station cares about our community and serving the public interest. I write today to object to the burdensome and unnecessary proposals contained in the Commission's Broadcast Localism proceeding. Each of the proposals in the proceeding are addressed separately below.

Communications Between Licensees and Their Communities

More than 25 years ago, the FCC abandoned its misguided "ascertainment" requirements, when it correctly concluded that market forces, rather than government mandates, may be relied upon to ensure that broadcasters air programming that is responsive to the needs and interests of their communities. Nothing has changed in those 25 years that should make the FCC reach a different conclusion now. If anything, broadcasters today face far more competition, from satellite radio and TV, cable, the Internet, and iPods, to such an extent that market forces virtually ensure that broadcasters air responsive programming. We know full well how important it is to address the needs and interests of the people in our communities. If we don't address those needs and interests, we know that market forces will drive listeners and viewers elsewhere. Government mandates will not change that equation, except to make it far more difficult and expensive to be a good broadcaster.

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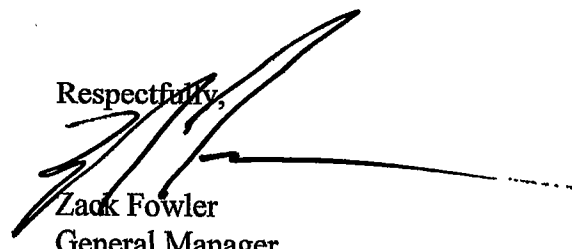
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Respectfully,

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Zack Fowler
General Manager

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

Received & Inspected
MAR 26 2008
FCC Mail Room

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Brian Edmon

Signature

3-20-08
Date

Name

1300 Chantry Hill Rd
Address

Title (if any)

ELL2 TOWN 37643-
Phone

423-542-5031

Organization (if any)